

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, *et al.*, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

20 Civ. 2489 (KMW) (GWG)

**DECLARATION OF JUSTIN M. SWARTZ IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR  
LEAVE TO FILE THIRD AMENDED COMPLAINT**

I, Justin M. Swartz, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at the firm of Outten & Golden LLP ("O&G") in New York, NY. I am admitted to practice before this Court. Along with lawyers from Shavitz Law Group, P.A., I am one of the lawyers primarily responsible for prosecuting Plaintiffs' claims on behalf of the collective.

2. I make this declaration in connection with Plaintiffs' Motion for Leave to File Third Amended Complaint.

3. I have personal knowledge of the matters set forth herein and would so testify if called as a witness at trial.

**Exhibits**

4. **Exhibit 1** attached hereto is a true and correct copy of the notice and submitted to California's Labor & Workforce Development Agency ("LWDA") stating that Plaintiff Robin Ceppos intended to bring claims for penalties under PAGA, and corresponding confirmation

page.

5. **Exhibit 2** attached hereto is a true and correct copy of the notice and submitted to California's Labor & Workforce Development Agency ("LWDA") stating that Plaintiff Nick Coker intended to bring claims for penalties under PAGA, and corresponding confirmation page.

\* \* \*

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: June 21, 2022  
New York, NY

/s/ Justin M. Swartz  
Justin M. Swartz  
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